

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

_____)	
)	
GREGORIO TREVINO, JR., et al.)	
<i>Plaintiffs,</i>)	
)	
v.)	Civil Case No. 15-CV-435
)	
HIDALGO COUNTY, TEXAS, et al.,)	
<i>Defendants.</i>)	
_____)	

Plaintiffs' Exhibit List

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiffs file this list of trial exhibits in accordance with the pre-trial requirements of this Court.

Plaintiffs may offer the following items as exhibits at trial. Such materials may be enhanced through blow-ups or otherwise. Plaintiffs reserve the right to amend and/or supplement this exhibit list. Plaintiffs also reserve the right to use Defendants' exhibits to the extent such exhibits are relevant and/or admissible.

Plaintiffs' Trial Exhibits

No.	Description	Bates No.	Admitted	Excluded
1	Plaintiff J.C. Cardenas - personnel file excerpts	Hidalgo 1-184		
2	Plaintiff J.C. Cardenas - medical record excerpts			
3	Photograph of Jesse Montalvo with Cuellar cap and Cuellar sticker on vehicle	Cardenas dep. exh.		
4	Plaintiff Rene Martinez Herrera – personnel file excerpts	Hidalgo 3024-60		
5	Plaintiff Santiago Zavala – personnel file excerpts	Hidalgo 548-722		
6	Plaintiff Santiago Zavala – medical record excerpts	xx		
7	Plaintiff Santiago Zavala – Texas Workforce Com'n record excerpts	Hidalgo 2381-2451		
8	Plaintiff Santiago Zavala – notes regarding events at Precinct One	Trevino 322-330		
9	Plaintiff Santiago Zavala – documents regarding damages	Trevino 351-406		
10	Plaintiff George Enriquez – personnel file excerpts	Hidalgo 185-319		
11	Plaintiff Pedro Garcia, Jr. – personnel file excerpts	Hidalgo 2452-2539		
12	Plaintiff Pedro Garcia, Jr. – Civil Service Com'n excerpts	Hidalgo 1602-1935		
13	Plaintiff Pedro Garcia, Jr. – grievance file excerpts			
14	Plaintiff Gregorio Trevino, Jr. – personnel file excerpts	Hidalgo		
15	Photographs: campaign slates and candidates; campaign scenes; Quintanilla sign distribution contact list; plants at Monte Alto Veterans' Park; Palomin truck with sign; Trevino's trailers with signs;	G. Trevino dep. exhibits		

16	Hidalgo County Defendants' job descriptions	Hidalgo 1342-1357		
17	Hidalgo County budgets – all precincts, 2012-2015	Hidalgo 1358-1373		
18	Hidalgo County Personnel Policy Manual	[no Bates]		
19	Blue Book Civil Service Rules	[no Bates]		
20	Civil Service Commission Rules Chapter III (amended 4/17/2008)	[no Bates]		
21	Brown Book, revised Chapter 6 (9/29/2009)	[no Bates]		
22	<i>Salas v. County of Hidalgo</i> : Cardenas' First Amended Complaint (3/9/2011)	Trevino 95-102		
23	Hidalgo County salary schedule	Hidalgo 1334-1341		
24	Hidalgo County list of terminated employees	Hidalgo 2577		
25	Leonel Oliveira – personnel file excerpts	Hidalgo 2579-2652		
26	Hidalgo County – TCDRS Retirement Summary Sheet	[no Bates]		
27	Texas Sec'y of State, web pages reflecting 2013 and 2014 election dates	[no Bates]		

In addition, Plaintiffs reserve the right to offer, use or refer to any exhibits, including business records, medical records, and billing records produced, identified, filed or offered by any other party. Plaintiffs further reserve the right to offer, use or refer to any documents, records, deposition transcripts or other items for the purpose of impeachment or rebuttal. Plaintiffs hereby tender the above for review and inspection at the offices of Najvar Law Firm PLLC at any mutually convenient time.

Respectfully submitted,

_____/s/ Jerad Najvar_____
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Certificate of Service

The undersigned counsel hereby certifies that on April 30, 2019, the foregoing document, and any accompanying exhibits and proposed order, was served on the Defendants in this matter by means of the court's CM/ECF system.

Mr. Rex Leach
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Counsels for Defendants

_____/s/ Jerad Najvar_____
Jerad Najvar